

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO**

**Human Rights Defense Center,**

Plaintiff,

**vs.**

**MICHELLE LUJAN GRISHAM**,  
individually and in her capacity as  
Governor of the State of New Mexico;  
**ALISHA TAFOYA LUCERO**,  
individually and in her capacity as Cabinet  
Secretary of the New Mexico Corrections  
Department; **MELANIE MARTINEZ**,  
individually and in her capacity as Deputy  
Secretary of the New Mexico Correction  
Department; **GARY MACIEL**,  
individually and in his capacity as Deputy  
Secretary of the New Mexico Correction  
Department; **BRIAN R. EVANS**,  
individually and in his capacity as Chief  
Executive Officer of The GEO Group, Inc.;  
**WAYNE H. CALABRESE**, individually  
and in his capacity as President and Chief  
Operating Officer of The GEO Group, Inc.;  
**THE GEO GROUP, INC. d/b/a LEA  
COUNTY CORRECTIONAL  
FACILITY**, a corporation; **JOHN AND  
JANE DOES 1-20**, individually and in their  
official capacities; and **ENTITIES 1-10**,

Defendants.

**No. 1:24-cv-01091-SMD-KRS**

**NOTICE OF AGREED EXTENSION OF TIME**

Pursuant to D.N.M. LR-Civ. 7.4(a), Plaintiff Human Rights Defense Center hereby notifies the Court that all parties, through their respective counsel, have conferred and have agreed to the following extensions of time:

1. Plaintiff and Defendants have agreed to explore a negotiated resolution. To

allow time for Plaintiff and Defendants to seek to resolve this matter without unnecessary expense, the parties have agreed to extend the briefing schedule as follows.

2. Plaintiff Human Rights Defense Center will file its replies to all Defendants' respective Responses in Opposition (Dkt. Nos. 19 & 29) to Plaintiff's Motion for Preliminary Injunction (Dkt. 3) on or before **March 21, 2025**.

3. Defendant Governor Michelle Lujan Grisham will file her reply to Plaintiff's Opposition (Dkt. 34) to her Motion to Dismiss (Dkt. 28) on or before **March 21, 2025**.

February 24, 2025

ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/ Marc J. Shinn-Krantz

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\* Admitted *Pro Hac Vice*

I hereby certify that on this 24th day of February 2025, I caused the foregoing to be electronically filed which caused service on all counsel of record by electronic means:

/s/ Marc J. Shinn-Krantz

Marc J. Shinn-Krantz